Mr. Daniel Stiehl
Venture Corporation
1701 West McDonald Street
Hartford City, IN 47348

Re: 009-15314
Minor Source Modification to:
Part 70 permit No.: T009-6492-00008

Dear Mr. Stiehl:

Venture Corporation was issued Part 70 operating permit T009-6492-00008 on December 28, 2000, for the operation of a stationary plastic automotive parts and components manufacturing plant. An application to modify the source was received on February 20, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall

not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Blackford County
Blackford County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

MINOR SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Venture Corporation
1701 West McDonald Street
Hartford City, Indiana 46348

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 009-15314-00008	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(b) Activities with emissions equal to or less than the significant activity thresholds: fume and mist emissions associated with heat transfer fluid miscellaneous drips from piping or transfer equipment; fugitive dust associated with road traffic or staging area traffic on the stone surface locations; particulate matter (PM_{10}) from the blower exhaust at the vacuum system serving the press building plastic part drilling stations.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) compression molding press, identified as P1, constructed in 1985, maximum capacity: 600 tons.

(b) One (1) compression molding press, identified as P2, constructed in 1985, capacity: 1,500 tons.

(c) One (1) compression molding press, identified as P3, constructed in 1985, capacity: 1,500 tons.

(d) One (1) compression molding press, identified as P4, constructed in 1985, capacity: 1,500 tons.

(e) One (1) compression molding press, identified as P5, constructed in 1985, capacity: 1,500 tons.

(f) One (1) compression molding press, identified as P6, constructed in 1985, capacity: 600 tons.

(g) One (1) compression molding press, identified as P7, constructed in 1997, capacity: 500 tons.

(h) One (1) compression molding press, identified as P8, constructed in 1998, capacity: 1,200 tons.

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Surface Coating [326 IAC 6-3-2(c)] [326 IAC 8-1-6]

The following requirements from previously issued approvals are no longer applicable because the surface coating operations have been removed from this source:

(a) Condition 1 from PC(05) 1581, issued on April 10, 1985, which states that the quantity of surface coating usage and solvent content, as percent VOC by weight, be such that VOC emissions shall not exceed 40 tons per year and a log of information necessary to document compliance with condition 1(a) be maintained.

(b) Condition 5 from OP 05-06-89-0059, issued on July 2, 1985, which states that emissions from the paint spray booths shall not be visibly detectable at the exhaust, be detectable near the exhausts or on the ground, or

cause any nuisance problem.

(c) Condition 6 from OP 05-06-89-0059, issued on July 2, 1985, which states that the quantity of surface coating usage and solvent content, as percent VOC by weight, be such that VOC emissions shall not exceed 40 tons per year.

(d) Condition 7 from OP 05-06-89-0059, issued on July 2, 1985, which states that a log of information necessary to document compliance with condition No. 6 be maintained.

(e) Condition 6 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that pursuant to Rule IAC 8-1.1-6, Best Available Control Technology (BACT) shall be air atomization with a VOC limit of 6.0 pounds per gallon of coating, excluding water, delivered to a coating applicator.

(f) Condition 7 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that the quantity of paint usage and solvent content, as percent volatile organic compound (VOC) by weight, be such that the VOC emissions from the surface coating facilities shall not exceed 20.75 tons per month (249 tons per twelve consecutive month period).

(g) Condition 8 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that a daily log of information necessary to document compliance with Condition # 7 be maintained and a quarterly summary of these individual monthly averages shall be submitted by the end of the month following the quarter being reported.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The VOC usage shall be limited such that the VOC emissions at each compression molding press (P1 through P6) shall be less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC at each facility shall be less than twenty-five (25) tons per year and the requirements of 326 IAC 8-1-6, New Facilities; General Reduction Requirements, are not applicable.

(b) Any change or modification that increases the potential to emit at any of the remaining molding presses (P7, P8, P9, and P10) to twenty-five (25) tons per year or more shall cause the facility to become subject to 326 IAC 8-1-6, New Facilities; General Reduction Requirements, and prior approval is required.

D.1.3 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) thermal fluid heaters, with a total heat input capacity of 6.2 million British thermal units per hour, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity,

whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Venture Corporation**
Source Location:	**1701 West McDonald Street, Hartford City, Indiana**
County:	**Blackford**
SIC Code:	**3089**
Operation Permit No.:	**T 009-6492-00008**
Operation Permit Issuance Date:	**12-28-2000**
Minor Source Modification No.:	**009-15314-00008**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed a modification application from Venture Corporation relating to the operation of a stationary plastic automotive parts and components manufacturing plant. The modification relates to the addition of the following emission units:

(a) Two (2) SRIM molding presses, identified as P9 and P10, each with a maximum unit capacity of 30 parts per hour.

Existing Approvals

The source was issued a Part 70 Operating Permit T009-6492-00008 on December 28, 2000. The source has since received the following:

(a) First Administrative Amendment No.: 009-9608, issued on November 4, 1998.

Enforcement Issue

(a) IDEM is aware that the two (2) new molding presses have been constructed and operated prior to receipt of the proper permit.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 20, 2002.

Emission Calculations

The molding compound consists of four (4) components.

1. Rubinate 8700: VOC content = 0%.

2. RIMline SL 87090: VOC content = 2.5 %

   Mold material usage per part = 2.06 lb
   RIMline content in mold material = 65%
   No. of parts per hour per press = 30
   Therefore, potential to emit (PTE) of VOC is as follows:

   = 2.06 lb/part x 30 parts/hr x 0.65 lb RIMline/lb mold material x 0.025 lb VOC/lb RIMline
   = 1.004 lb/hr = 1.004 lb/hr x 8760hr/yr / 2000 lb/ton = 4.4 tons/yr
   Therefore for two (2) presses, PTE of VOC = 8.8 tons/yr.

3. Mold Release Agent RCT-B2150: VOC content = 95%

   RCT-B2150 usage per part = 0.5 oz
   No. of parts per hour per press = 30
   Therefore, potential to emit (PTE) of VOC is as follows:

   = 0.5 oz/part x 1 lb/16 oz x 30 parts/hr x 0.95 lb VOC/material
   = 0.89 lb/hr = 0.89 lb/hr x 8760 hr/yr / 2000 lb/ton = 3.90 tons/yr
   Therefore for two (2) presses, PTE of VOC = 7.8 tons/yr.

4. Mold Cleaning Paste LH-1: VOC content = 85%

   Usage = Negligible
   PTE of VOC = Negligible

The total potential to emit of VOCs from the two (2) molding presses = (8.8 + 7.8) tons/yr = 16.6 tons/yr.

Potential To Emit of the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	Negligible
PM-10	Negligible
SO_2	Negligible
VOC	16.6
CO	Negligible
NO_x	Negligible

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii) for modifications that would have a potential to emit less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Blackford county has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)[1]
PM	10.2
PM-10	11.0
SO_2	1.08
VOC	121
CO	16.0
NO_x	18.1

HAPs	Potential To Emit[1] (tons/year)
Styrene	99.9
Toluene	6.32
MDI	0.526
Benzene	0.0003
Dichlorobenzene	0.00003
Formaldehyde	0.002
Hexane	0.052

HAPs	Potential To Emit[1] (tons/year)
Lead	0.00007
Cadmium	0.00003

[1] Based on Technical Support Document for Part 70 Permit No. 009-6492-00008

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)
Process/facility	VOC
Two (2) molding presses	16.6
PSD Significant Threshold	25

This modification to an existing minor source (under PSD rules) is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the two (2) new molding presses.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to the two (2) new molding presses.

State Rule Applicability - Entire Source

The state rule applicability has not changed as a result of the minor source modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

The state rule applicability has not changed as a result of the minor source modification**.**

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The two (2)new molding presses, are not subject to the requirements of 326 IAC 8-1-6, New Facilities; General Reduction Requirements, because the potential emissions of VOC from each press is less than 25 tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no specific compliance monitoring requirements applicable to this source.

Conclusion

The operation of this plastic automotive parts and components manufacturing source shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 009-15314-00008.